

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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6/24/02

Fact Sheet
EPA Region 6's
Ready for Reuse Determination
Sheffield Steel Corporation
Sand Springs, OK

## **Facility Background:**

- The Sheffield Steel Corporation facility is located at 2300 South Highway 97 on the southwest side of the City of Sand Springs, Tulsa County, Oklahoma and consists of approximately 144 acres. The majority of the adjacent property is used for light or heavy industrial/commercial purposes. A levee on the south and western boundary separates the facility from the Arkansas River.
- Sheffield Steel and its predecessors have operated the facility for more than 72 years as a steel manufacturing facility. Sheffield Steel is the only raw steel producing facility in Oklahoma. Sheffield Steel currently operates two electric arc furnaces (EAFs), a continuous caster, and a rolling mill to produce new steel products, including steel billets, concrete reinforcing bar and fence posts, from a feedstock of virtually one hundred percent iron and steel scrap.
- The Sheffield facility currently consists of several large structures, including two (2) Plant Office Buildings which are located immediately west of Highway 97, three (3) large Warehouse Buildings, a Warehouse Cooling Bed Building, a Mill Wright Building, an Electric Furnace Building, a Post Storage Building, a Finish Mill Building, a Billet Building, and a Central Maintenance Building. There are also several large areas, located primarily in the southwest corner of the site, which are used to store piles of scrap metal prior to processing. Two areas of the site are leased and operated by Sheffield contractors. The Slag Processing Area, located in the southwest portion of the property, is operated by Olympic Mill Services. The Turning Mill Area, located in the northwest corner of the property, is operated by Sand Springs Metal Processing.
- Sheffield processes over 50,000 tons of scrap metal each month through the two 85-ton electric arc furnaces (EAFs). Approximately 14,000 cubic yards of EAF slag are generated annually by the steel production process. Olympic Mill Services manages the slag by breaking it up and screening it into sizes suitable for use as concrete aggregate and road surfacing. The material produced is not classified as a solid or hazardous waste.
- The only hazardous wastes generated by Sheffield are EAF dust and small quantities of

cleaning solvents. The EAF dust is regulated as K061 waste by EPA. Since 1985, the dust has been collected in closed railcars and transported to Mexico for recycling. Prior to 1985, the dust was disposed of in three (3) onsite landfills. The cleaning solvents are managed and recycled as hazardous waste by Safety-Kleen Corporation. Solid wastes generated at the site include used lubricating oil, rubbish, and mill scale. The mill scale, composed of iron oxide, is sold as a byproduct to the cement-making industry.

## **Regulatory Background:**

- In the course of the historical manufacturing activities, Sheffield has managed hazardous materials and some releases have occurred.
- Sheffield does not have a RCRA permit addressing the facility as a TSD or having corrective action obligations nor does is it currently under any outstanding orders with EPA or Oklahoma DEQ.
- Twelve areas of concern were identified from previous investigations and sampling reports:
  - ⇒ PA conducted 1986
  - Compliance Evaluation Inspection Report 1997
  - Letter order with EPA Region 6 Enforcement, in lieu of RCRA 3013 order **1998** (terminated 5/8/02 in letter from EPA to Sheffield)
  - □ Draft Report on Environmental Conditions *January 2000* \*RCRA permits given site in *September 2001*
  - Final Report on Environmental Conditions *December 2001*
- To address releases/areas of concern, Sheffield voluntarily agreed to perform certain corrective action activities under RCRA. Pursuant to discussions between Oklahoma DEQ EPA Region 6 and Sheffield Steel Corporation on December 7, 2001, it was agreed that Sheffield Steel would address its corrective action needs according to the EPA Region 6 Corrective Action Strategy (CAS).
- On December 7, 2001, EPA and Oklahoma DEQ met with SSC for a facility scoping meeting. The purpose of the meeting was to discuss the previous investigations conducted at the facility, discuss data quality objectives, review the facility conceptual site model, tour the facility operations areas and areas of investigation, and to determine if any data gaps still existed at the facility. Based on the data review and discussion during the scoping meeting, EPA and Oklahoma DEQ determined that there were no significant data gaps remaining for the facility, and that SSC should proceed forward through the CAS by preparing a Risk Evaluation Report and a Risk Management Plan. This report is the Risk Evaluation Report and Risk Management Plan for the Sheffield Facility and presents the conceptual site model, the results of the CAS Human Health Risk-Based Priority Screen (Screen), the results of the Ecological Criteria Worksheet and Ecological Assessment Checklist, and discusses risk management activities that will ensure protection of human health and the environment at the site.
  - Risk Evaluation Report/Risk Management Plan *May* 28, 2002

Releases at the facility were compared to CAS Screening Bright-Line Tables and concentrations of contaminants (metals) did not exceed screening criteria for industrial worker exposure scenarios.

## Remedy:

- Remedy for Sheffield property consists of institutional controls:
  - ✓ "Deed notice in the county court records that describes the environmental conditions at the facility (i.e. contaminants, concentrations, locations, associated risk, etc). This is a requirement by state law and the Oklahoma DEQ.
  - Property owner(s) will provide an annual report in written and electronic format to the Oklahoma DEQ and EPA that the property use has not changed, and that the assumptions used to evaluate risks to site personnel are valid. If conditions at the SSC facility change, including environmental conditions, land use, Standard Industrial Classification (SIC Code), site receptors, and remedy performance, it will be necessary to revisit the risk management activity to ensure its protectiveness. The electronic version of this information will be included and maintained in a data base that will be used for tracking institutional controls.
  - ✓ Property owner(s) will notify and make available to potential lessees or potential new property owners the Ready for Reuse Determination letter at the facility in advance of any conveyance.
  - ✓ Property owner(s) will notify the Oklahoma DEQ prior to leasing or selling any portion of the property, or of any anticipated land use change.
  - Property owner(s) is responsible for maintaining the institutional control (i.e., the risk management activity), even upon transfer of or change in ownership or control of the Property, unless and until Sheffield Steel documents in writing to Oklahoma DEQ and EPA that the new owner or operator has contractually agreed to assume responsibility for maintaining the institutional control."
- With this Ready for Reuse Determination, Oklahoma DEQ and EPA Region 6 agree that Sheffield Steel Corporation has successfully completed its cleanup under the CAS and that environmental conditions at the property are protective of its current use and anticipated future use as an industrial operation.